

SAVI's petition appears to be asking as a manufacturer of unlicensed RF devices to liberalize rules regarding permitted field strengths for such devices in bands allocated to the Amateur Service. I believe the frequency band chosen by SAVI was done to minimize their economic cost without interference avoidance in mind, and is among the worst choices SAVI could have made from that perspective."

I question whether SAVI has failed to show that its unlicensed devices operating at their proposed field strengths could operate at their duty cycles on an itinerant basis without unduly risking harmful interference to amateurs.

It appears to me that because RFID tags are itinerant and mobile, there is absolutely no chance whatsoever that interference between Amateur stations and RFID tags could be mitigated once the devices are deployed, and the interference potential of these devices is thus completely unpredictable and cannot be remedied easily.